

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR DRAFT PERMIT No. F-05-036

KENTUCKY CABINET CORPORATION

CORBIN KY.

SEPTEMBER 27, 2005

MARK LABHART, REVIEWER

SOURCE I.D. #: 021-235-00054

SOURCE A.I. #: 74649

ACTIVITY #: APE20050001

**SOURCE DESCRIPTION:**

Kentucky Cabinet Corporation, located in Corbin Kentucky, manufactures kitchen and bath cabinetry. This is a new source, beginning operation in 2004. Currently, the facility has only woodworking equipment. The source is planning the addition of gluing and finishing operations with this permit action. The pollutants of concern are particulate matter, VOC and HAP. Particulates from the woodworking operations are controlled with portable dust collecting units located inside of the building. The planned adhesive is a low VOC and HAP product. The majority of the VOC and HAP will be emitted from 3 spray booths used for finishing operations. Potential emissions of VOC and HAP are greater than major source thresholds, but Kentucky Cabinet Corp. has requested Federally Enforceable Limits on the potential to emit.

**COMMENTS:**

- Emission factors for the woodworking operation were provided by the consultant. These factors were compared against emission factors previously used by the Division for woodworking operations, and they were found to be comparable.
- Dust collection is integral to woodworking operations hence the filters will always be in operation whenever woodworking is occurring. Collection efficiency is assumed to be 90% for the filters and an additional 70% control efficiency is assumed for the building enclosure since there are no external exhausts from the dust control units.
- VOC and HAP emissions calculated by material balance.
- Federal regulation 40 CFR 63, Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations is not applicable because of the conditional major limitations. Subpart JJ is applicable to major sources only.
- The Screen 3 dispersion model was used to estimate pollutant concentrations for all HAP emitted from this source. All predicted concentrations were below the EPA's Prioritized Dose Response Values, (PDRVs) for each HAP emitted.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

Kentucky Cabinet Corporation has requested voluntary permit limits of less than 9.0 tons per year of individual hazardous air pollutants (HAP), less than 22.5 tons per year of combined HAPs, and less than 90 tons per year of VOC.

**PERIODIC MONITORING:**

Kentucky Cabinet Corporation shall report VOC and HAP emissions semiannually.

**OPERATIONAL FLEXIBILITY:**

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.

*S:\SHARE\titlev\stat\_bas.djg*